

**From:** [Duncan, Mary J](#)  
**To:** [Rauschenberger, Heath](#)  
**Subject:** [EXTERNAL] Draft MOAs with EPA and DA  
**Date:** Thursday, February 27, 2020 2:55:23 PM  
**Attachments:** [image001.png](#)  
[Draft - FL EPA MOA 9 20181101 CLEAN.DOCX](#)  
[Draft CWA 404g MOA Between DA and FL DEP 03052019.docx](#)

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Heath,

The species process in the EPA draft MOA is old and needs to be revised, but the Corps one is pretty complete.

To clarify the “off ramp” concept to the Corps – currently the way the process is written, EPA can request to review an application and further consult with the Services, or DEP can request EPA to review an application if we cannot incorporate measures or cannot resolve issues. Our agencies would discuss the issues to decide whether or not it should be transferred to the Corps or if there are other alternatives. Heather can explain it better the next time we get together.

Mary



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